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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S RESPONSE
TO ORDER TO SHOW CAUSE**

Waymo hereby responds to the Order To Show Cause Regarding Sameer Kshirsagar (the “Order”).

Defendants’ administrative motion was premature, as Defendants did not properly meet and confer with Waymo, and Waymo never refused Defendants’ request to show Mr. Kshirsagar the confidential information that he misappropriated.¹ Waymo and Defendants have now met and conferred, and Waymo agrees that Defendants may show Mr. Kshirsagar the confidential documents that he misappropriated provided (i) that Mr. Kshirsagar agrees to be bound by the Interim Protective Order and (ii) that Mr. Kshirsagar and defense counsel agree to be bound by the guidelines set out in the Court’s Order (*e.g.*, Mr. Kshirsagar should not be given copies of such documents to keep, Mr. Kshirsagar agrees not to use the contents of such documents for any purpose other than the preparation of the defense in this case, and Mr. Kshirsagar will be shown such documents only to the extent defense counsel genuinely believes that it is essential to prepare the defense).

DATED: March 24, 2017

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By /s/ Charles K. Verhoeven

Charles K. Verhoeven

Attorneys for Plaintiff Waymo LLC

¹ Compare Dkt. 68-1 ¶ 3 (original declaration), with Dkt. 69 ¶ 3 (corrected declaration) (clarifying that the parties met and conferred regarding Defendants’ request “to show Mr. Kshirsagar the *file names* of the files at issue,” a request to which Waymo agreed) (emphasis added).